

LATHAM & WATKINS LLP
Peter A. Wald (Bar No. 85705)
James L. Day (Bar No. 197158)
Risha N. Jamison (Bar No. 230820)
505 Montgomery Street, Suite 2000
San Francisco, California 94111-2562
Telephone: (415) 391-0600
Facsimile: (415) 395-8095

Attorneys for Defendant
LAFAYETTE SOFTWARE, INC.

GAYLE ZICKGRAFF GREEN, # 112272
BINDER & MALTER, LLP
2775 Park Avenue
Santa Clara, California 95050
Telephone: (408) 295-1700
Facsimile: (408) 295-1531

Attorneys for Plaintiff
JEAN-LUC GRAND-CLEMENT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE JUDICIAL DISTRICT

JEAN-LUC GRAND-CLEMENT,

Plaintiff,

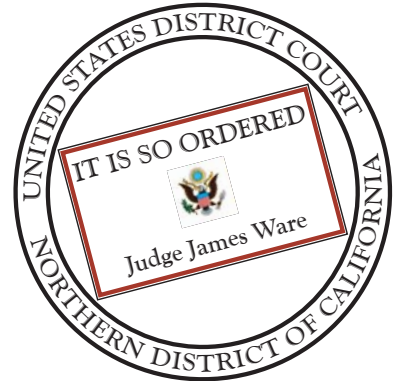
v.

LAFAYETTE SOFTWARE, INC., a
Delaware Corporation,

Defendant.

CASE NO. C04-04956 JW

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE TO CONDUCT
MEDIATION**



Whereas, the Court has set the deadline for the parties to conduct mediation in this matter by June 30, 2005;

Whereas, the parties conducted a telephone conference with the appointed mediator and initially scheduled a mediation session for June 21, 2005;

Whereas, there is a previously-filed proceeding involving both parties to this dispute pending in the Tribunal de Commerce de Versailles (Commercial Court of Versailles) in France in which the parties understand an order has been issued directing that defendant Lafayette

Software, Inc. be liquidated;

Whereas, the parties understand that the Liquidator appointed by the French court accept bids for the primary intellectual property assets of Lafayette Software, Inc. on or about June 23, 2005 and may conclude the liquidation within a short time, though there is not set deadline;

Whereas, in light of the liquidation proceedings in France both parties believe that a 90 day extension to the current mediation deadline is advisable to allow the parties to assess the impact of the French proceeding on this action;

Wherefore, plaintiff JEAN-LUC GRAND-CLEMENT and defendant LAFAYETTE SOFTWARE, INC., stipulate and jointly request that the deadline for mediation in this case be extended to September 30, 2005;

IT IS SO STIPULATED.


Dated: June __, 2005

BINDER & MALTER, LLP

By _____
Gayle Zickgraff Green
Attorneys for Plaintiff
JEAN-LUC GRAND-CLEMENT

Dated: June 30, 2005

LATHAM & WATKINS LLP

By  _____
James L. Day
Attorneys for Defendant
LAFAYETTE SOFTWARE, INC.

ORDER

The current mediation deadline is vacated. The deadline for conducting mediation in this case is September 30, 2005.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/3/05

/s/ James Ware
The Honorable James Ware
United States District Judge

1 Software, Inc. be liquidated;

2 Whereas, the parties understand that the Liquidator appointed by the French court accept
3 bids for the primary intellectual property assets of Lafayette Software, Inc. on or about June 23,
4 2005 and may conclude the liquidation within a short time, though there is not set deadline;

5 Whereas, in light of the liquidation proceedings in France both parties believe that a 90
6 day extension to the current mediation deadline is advisable to allow the parties to assess the
7 impact of the French proceeding on this action;

8 Wherefore, plaintiff JEAN-LUC GRAND-CLEMENT and defendant LAFAYETTE
9 SOFTWARE, INC., stipulate and jointly request that the deadline for mediation in this case be
10 extended to September 30, 2005;

11 IT IS SO STIPULATED.

12 Dated: June 30, 2005

BINDER & MALTER, LLP

13
14 By 

Gayle Zickgraff Green
Attorneys for Plaintiff
JEAN-LUC GRAND-CLEMENT

15
16 Dated: June __, 2005

LATHAM & WATKINS LLP

17
18 By _____

James L. Day
Attorneys for Defendant
LAFAYETTE SOFTWARE, INC.

19
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21
22 **ORDER**

23 The current mediation deadline is vacated. The deadline for conducting mediation in this
24 case is September 30, 2005.

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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27 Dated: 8/3/05

/s/ James Ware

The Honorable James Ware
United States District Judge